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1 other people's writings?

2 A. In discussions. I'm the editor  
3 of the volume. So, again, these are country  
4 reports on what is going on in each country  
5 each year.

6 Q. Is the boilermaker report  
7 published?

8 A. No, it has just affected the way  
9 I wrote about that book. Learning about  
10 that -- let me put it this way. I've just  
11 finished another book, a little book called  
12 Fads in Fashion in Healthcare Policy and  
13 Management. One of the chapters of that book  
14 is the growth of a movement for health  
15 promotion in which I talk about the new  
16 perspective on health and that, of course,  
17 brought back all of the disputes in the 1970s  
18 when this movement started.

19 So, other than that, the  
20 concentration on asbestos, of course, was in  
21 connection with Celotex and in connection with  
22 the boilermaker's report, and in connection  
23 with the research I did to produce this  
24 document.

25 Q. This document again being Marmor

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1 research and that started in May of 2002?

2 A. Right.

3 Q. And continues until today, which  
4 is April of 2003?

5 A. Yes.

6 Q. Tell me what you've done since  
7 then during this third leg of your  
8 concentration.

9 A. Well, in this case, what I had to  
10 do, and for reasons I'll explain in just a  
11 second, I had to expand my capacity to do  
12 research because I'm limited by Yale's rules in  
13 the number of days a week that I can do any  
14 outside work at all. So, I put together a  
15 research team made up of my former post-docs  
16 and former associates to spend an enormous  
17 amount of time scouring the literature publicly  
18 available on asbestos and its harms, asbestos  
19 and its benefits for various groups. That  
20 group has work steadily since May.

21 I'm limited to one day a week, so  
22 that they do the scouring under my direction,  
23 and we discuss each of those categories of  
24 publicly available information, how you go  
25 about getting it, what sort of exhibit would be

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1 Exhibits --

2 MS. ROSENBERG: Binder.

3 Q. Binder. When did you do that  
4 research?

5 A. That research got done between  
6 May of last year and now.

7 Q. Let me back up for a moment. How  
8 much were you paid for your research in the  
9 boilermaker case?

10 A. I think it was something like  
11 \$400 an hour, between 350 and 400. I need to  
12 look it up.

13 Q. What was the total?

14 A. I think it was close to the total  
15 for the McCracken case, about \$40,000.

16 Q. That was for the second leg of  
17 your concentration?

18 A. Right.

19 Q. Let's talk about the third leg of  
20 your concentration now -- don't let me  
21 mischaracterize -- but would it be, the third  
22 leg of your concentration, be the research that  
23 you've done for the Union Carbide Company?

24 A. Yes, absolutely.

25 Q. That is the third leg of your

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1 a fair representation of what was publicly  
2 available when there was many, many  
3 illustrations of it.

4 You want me to describe the parts  
5 to it?

6 Q. Sure. Feel free.

7 A. We broke it up into four  
8 different categories; one is what literature  
9 was publicly available in the medical and  
10 scientific communities going back to the  
11 earlier part of the century and particularly  
12 the 1920s.

13 The second group of available  
14 literature that we want to look at was what was  
15 known about asbestos in the public health  
16 community that became prominent in 1930s.

17 The third group is when and what  
18 was available in the literature of unions about  
19 asbestos and its dangers and benefits, and the  
20 fourth what about general government, not just  
21 public health, and finally, if you widen the  
22 net to the general media, what was available  
23 where that could have reached wide publics and  
24 be thought to be in a defensible sense publicly  
25 available or not.